

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

TAMMY COVINGTON and)	
JEFFREY COVINGTON,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 19-cv-00718-PRW
)	
CSAA FIRE AND CASUALTY)	
INSURANCE, d/b/a AAA FIRE AND)	
CASUALTY INSURANCE COMPANY, INC.)	
)	
Defendant.)	

JOINT MOTION TO ENLARGE DISCOVERY DEADLINE

All parties, jointly through their counsel of record, respectfully move the Court to enlarge the discovery deadline and *Daubert* Motions deadline in this case from their current date of Tuesday, July 30, 2020, to a new date of Friday, August 14, 2020. In support, the parties state:

1. Previously, there has been only one motion to enlarge discovery deadlines in this case [Dkt. 25].
2. The Court granted the previous request for enlargement on March 26, 2020 [Dkt. 29].
3. The previous extension was sought because of issues with COVID-19 [Dkt. 25].
4. The parties have diligently continued with discovery despite ongoing issues with COVID-19. However, one witness, Alana Hare, whom the Plaintiffs have requested

to depose, is not available for deposition until Tuesday, August 11, 2020. Thus, an enlargement of the discovery deadline is necessary for Ms. Hare to be deposed.

5. Furthermore, the Defendants are seeking to obtain records from witness Don Sharp, but have not been able, thus far, to ascertain the location of Mr. Sharp for this purpose. Accordingly, and depending on the content of Mr. Sharp's records, if obtained, the Defendants may seek to depose Mr. Sharp on or before the new proposed discovery deadline of August 14, 2020. Thus, an enlargement of the discovery deadline is necessary for this purpose in addition to the deposition of Ms. Hare mentioned above.

6. The parties do not seek enlargement of any other deadlines except the discovery deadline. Thus, if the enlargement of the discovery deadline is granted, it will not affect any other deadlines, nor will it affect the parties' ability to be prepared for the September 2020 Docket.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2020, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Douglas J. Shelton – dshelton@sheltonlawok.com

s/ Joshua K. Hefner

Joshua K. Hefner